

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
W.R. GRACE & CO., et al.,) Case No. 01-1139 (JKF)
) Jointly Administered
Debtors.) Re: Docket No. 13120

**CERTIFICATION OF COUNSEL RE SUPPLEMENTAL ORDER RE PRODUCTION
OF X-RAYS BY NON-MESOTHELIOMA CANCER CLAIMANTS**

The undersigned counsel for W.R. Grace & Co., et al (the "Debtors") hereby certifies that:

1. On February 5, 2007, the Court held an emergency hearing (the "Hearing") in these cases wherein the Court considered, among other things, the *Debtors' Expedited Motion to Modify Order Regarding Production of X-Rays Based on Substantial Non-Compliance with Order [Docket No. 14441]*, and the objections and responses thereto.
2. Attached hereto as Exhibit 1 is a proposed *Supplemental Order Regarding Production of X-Rays by Non-Mesothelioma Cancer Claimants* (the "Order") that reflects the disposition of this matter as provided at the Hearing and as to which the Debtor, the Esserman Firms and the MMWR Firms (as defined in the Order) have agreed and as to which neither the ACC nor the FCR oppose its entry (however, the ACC and the FCR expressly agree to the relief provided in Paragraph 4 of the Order).
3. The Debtors respectfully request that the Court enter the Order at its earliest convenience.

4. Counsel for the Debtors is available, should the Court have any questions or concerns with the foregoing or the Order.

Dated: February 20, 2007

KIRKLAND & ELLIS LLP
David M. Bernick, P.C.
Scott McMillin
Ellen Ahern
200 East Randolph Drive
Chicago, Illinois 60601
Telephone: (312) 861-2000
Facsimile: (312) 861-2200
And

KIRKLAND & ELLIS LLP
Barbara Harding
David Mendelson
Brian Stansbury
Amanda Basta
655 Fifteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 879-5000
Facsimile: (202) 879-5200

and

PACHULSKI STANG ZIEHL YOUNG
JONES & WEINTRAUB LLP.



Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
919 N. Market Street, 17th Floor
Wilmington, Delaware 19801
Telephone (302) 778-6407
Telefax (302) 652-4400